

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

DELTA PILOTS ASSOCIATION,
a labor organization
incorporated in Florida
Plaintiff

v.

JOHN DOE,
an individual
Defendant.

Civil Action No.: 1:14-cv-00225-AKH

**DECLARATION OF
RICHARD EAGAN**

I, Richard Eagan, do declare as follows:

1. I make this Declaration of my own free will, based on my personal, first-hand knowledge, unless otherwise specifically indicated, and would so testify under oath:
2. This Declaration is submitted in support of “Plaintiff’s Memorandum Of Law Opposing Defendant’s Motion For Summary Judgment.”
3. I reside in Saint Petersburg, Florida . I am employed by Delta Air Lines, as a pilot.
4. I was the former web master for the Delta Pilots Association (“DPA”) in 2013. I was one of two persons authorized to and have secure access to DPA’s SquareSpace account, critical files, code, and programs on behalf of DPA at all relevant times.
5. In the fall of 2013, when DPA’s web site was hacked, I earned approximately \$203 an hour as an A320 pilot (Captain) employed by Delta Air Lines.
6. Following the discovery by Tim Caplinger of the hacking of DPA’s website on November 8, 2013 and December 3, 2013, I assisted Tim Caplinger in responding to the hacking.
7. I spent approximately thirty-two (32) hours responding to the attack, assessing damage from it, and restoring it to as much functionally as possible.

8. My effort to respond to the attack included the following: Reviewed all website code and reviewed DPA website host (SquareSpace) settings to determine cause of the problem and did everything possible to repair damages Assisted Tim Caplinger on any questions he had about recovering from the attack.

Pursuant to 29 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on: June 14, 2018

By: 
Richard Eagan